



MWD

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office

October 14, 2002

FEDERAL EXPRESS

Mr. Paul Marshall
California Department of Water Resources
Bay-Delta Office
1416 Ninth Street
Sacramento CA 94236-0001

Dear Mr. Marshall:

Notice of Preparation for the South Delta Improvements Program
Draft Environmental Impact Report/Environmental Impact Statement

The Metropolitan Water District of Southern California (Metropolitan) has received a copy of the Notice of Preparation (NOP) for the South Delta Improvements Program (SDIP) Draft Environmental Impact Report/Environmental Impact Statement (Draft EIR/EIS). The SDIP was previously identified as an action in the CALFED Bay-Delta Program Programmatic EIR/EIS to optimize the use of the Delta as the means for conveyance of State and Federal project export water. The joint state-federal CALFED Bay-Delta Program was formed to develop and implement a long-term comprehensive plan to restore ecological health and improve water management for beneficial uses of the Bay-Delta system. The SDIP project proposes to increase the maximum allowable diversion capacity at the State Water Project's (SWP's) Clifton Court Forebay through increased pumping at the Harvey O. Banks pumping plant, provide an adequate water supply for South Delta Water Agency, and improve conditions for San Joaquin River salmon in the south portion of the Sacramento-San Joaquin Delta in portions of San Joaquin and Contra Costa counties.

The proposed SDIP project and alternatives would consist of the following project elements: increasing the maximum allowable diversion capacity at Clifton Court Forebay to 8,500 cubic feet per second (cfs); dredging portions of Old River and West Canal to improve conveyance capability during periods of high SWP and Central Valley Project (CVP) Delta exports; constructing permanent operable barriers to improve water supply reliability and water quality in the south Delta; dredging local channels to reduce the frequency of barriers operations and to accommodate improvements to existing agricultural diversions both upstream and downstream of the proposed barriers; and constructing a permanent operable fish control structure at the head of Old River to reduce fish losses at the CVP and SWP export facilities. The Draft EIR /EIS would

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include of a range of alternatives, including a no-action alternative. This letter contains Metropolitan's views, as a potentially affected public agency, on the scope and content of the Draft EIR/EIS.

In July 1999, Metropolitan's Board of Directors adopted principles that define Metropolitan's policy with regard to the CALFED Bay-Delta Program. The principles serve as guidelines for the Board and provide focused direction on issues regarding CALFED Bay-Delta policy. As part of its policy principles, Metropolitan strongly supports enhanced water system capability through expanded pumping at the Harvey O. Banks pumping plant. Under its Integrated Resource Plan (IRP), Metropolitan has relied on increased pumping of water during wet years to enable storage of water during periods of reduced water supply in order to accommodate more flexible operations required for the protection of fish species. The proposed project and the increase in diversion capacity to 8,500 cfs is supportive of Metropolitan's CALFED Bay-Delta policies and critical to increased water storage.

As previously stated, the CALFED Bay-Delta Programmatic Final EIR/EIS identified the SDIP as a project that would optimize the use of the Delta as the means for conveyance of State and Federal project export water. Metropolitan would like to ensure that the SDIP Draft EIR/EIS acknowledges the system-level mitigation measures of the CALFED Bay-Delta Program.

Metropolitan believes that the Draft EIR/EIS should focus on the unrestricted use of the maximum diversion capacity of 8,500 cfs. By analyzing the potential use of the maximum allowable amount of water, the analysis will capture the full range of impacts that could occur as a result of project implementation. Metropolitan believes that it is important to analyze the maximum foreseeable usage of the 8,500 cfs, considering future opportunities for conveying water for storage, demand levels, and all reasonably foreseeable sources of water.

Metropolitan supported the creation of the Environmental Water Account (EWA) as part of the CALFED Record of Decision and acknowledges that the EWA has reduced conflict, increased water supply reliability, and helped to reduce losses of endangered fish species at the export facilities. The EIR/EIS should include discussion of possible modifications to the EWA that might be required to maintain EWA effectiveness assuming implementation of the SDIP. However, the future of the EWA is uncertain. It may be upsized, downsized, or even eliminated in the future. Its priorities may shift away from Delta exports toward other water management modifications. The Draft EIR/EIS should account for these contingencies by analyzing SDIP operations under the assumption that no export reductions are made by the EWA.

The SDIP, as a part of the CALFED program, is subject to the mitigation measures that address the impact of the CALFED program on biological resources in the Bay-Delta system. Metropolitan requests that biological impact analyses should have a basis in peer-reviewed

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literature to include the population effects of export pumping on fish populations. The CALFED science panel would be an appropriate peer group for this task.

Already identified as an issue by the California Department of Water Resources (DWR) and U.S. Bureau of Reclamation (USBR) in the NOP, Metropolitan agrees that water quality is an important issue and requests that an analysis of the potential effects of the proposed project on both export and in-Delta drinking water quality be included in the Draft EIR/EIS. The analysis should account for both the operation of temporary barriers and the possible operation of permanent barriers. The project description should take into account the possibility that temporary barriers will be used for the first few years after the expansion to 8,500 cfs and that permanent barriers may be constructed thereafter.

Because implementation of the proposed project could facilitate other actions that would in turn affect the SDIP, Metropolitan requests that the cumulative impacts discussion address the impacts on hydrology, water quality, biological resources, and water supply availability of the increased pumping capacity to move water generated by upstream storage during periods of low biological vulnerability. This analysis should include a complete evaluation of the cumulative impacts of this proposed project with other CALFED projects.

We appreciate the opportunity to provide input to your planning process and we look forward to receiving future environmental documentation on this project. If we can be of further assistance, please contact me at (213) 217-6242.

Very truly yours,

A handwritten signature in black ink, appearing to read "Marty Meisler", with a stylized, flowing script.

Marty Meisler
Interim Manager,
Environmental Planning Team

JAH/rdl

(Public Folders/EPU/Letters/22-OCT-02B.doc – Paul Marshall)